

FILED

June 02, 2021

CLERK, U.S. DISTRICT CLERK  
WESTERN DISTRICT OF TEXAS  
BY Melanie Miller  
DEPUTY

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

JESSE FINCH

CASE NUMBER: **W21-109M**

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.

On or about June 1, 2021, in Bell County, in the Western District of Texas, defendant(s), being a person who knew he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, and said firearm was in and affecting commerce, in violation of Title 18, United States Code, Section(s) 922(g)(1) and 924(a)(2).

I further state that I am a(n) Special Agent, Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

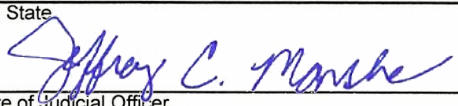
continued on the attached sheet and made a part hereof: YES



DANIEL TICHENOR, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

June 2, 2021  
Date  
Jeffrey C. Manske  
U.S. Magistrate Judge  
Name & Title of Judicial Officer

Waco, Texas  
City and State  
  
Signature of Judicial Officer

## **AFFIDAVIT IN SUPPORT OF COMPLAINT**

BEING FIRST DULY SWORN, Affiant, Daniel Tichenor, deposes and states the following:

I, Daniel Tichenor, am a Special Agent with the FBI, duly appointed according to law and acting as such, and have been employed by the FBI since December 2004. As an FBI Special Agent, I am an "investigator or law enforcement officer" within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516. I am currently assigned to the San Antonio Division, Waco Resident Agency, of the FBI. In this assignment, I am tasked with investigating a myriad of criminal offenses including the investigation of violent gangs, drug trafficking organizations, and violations of Federal firearms statutes. Since becoming a Special Agent, I have participated in numerous criminal investigations, including many involving drug trafficking, organized criminal enterprises, violent gangs, Federal firearms violations, and public corruption. Through my training, education, and experience, I have become familiar with the manner in which illegal drugs are imported and distributed, the method of payment for such drugs, and the efforts of persons involved in such activities to avoid detection by law enforcement, including the use of vague and/or coded language during their conversations related to drug trafficking, money laundering, and violent gang related activities.

On June 1, 2021, a reliable confidential human source, hereafter CHS, contacted a detective with the Temple Police Department (TPD) and advised a white GMC Envoy would be traveling near Highway 36 between the towns of Buckholts and Moody. The CHS reported JESSE FINCH was in the vehicle and was in possession of narcotics and a shotgun. Upon receiving this information, the TPD detective searched TPD records for more information regarding FINCH. The TPD detective was able to obtain a photograph of FINCH and determined FINCH was a fugitive from justice, as he was subject of a felony arrest warrant.

Thereafter, law enforcement agents conducted surveillance on Highway 36 in Bell County in an effort to locate and apprehend FINCH. Law enforcement agents were able to locate a white GMC Envoy, as described by the CHS, and followed this vehicle into the city of Temple. Law enforcement agents followed the Envoy until it pulled into the parking lot of a Cefco gas station located at 22514 SW HK Dodgen Loop in Temple. After parking, the driver of the Envoy exited the vehicle. Upon his exit, agents recognized FINCH as the driver. Law enforcement agents subsequently approached FINCH and arrested him for the outstanding felony warrant.

A search of FINCH following his arrest revealed he had four rounds of 12 gauge ammunition in the pockets of the shorts he was wearing. Additionally, law enforcement agents who approached the vehicle FINCH was driving observed in a plain view a 12 gauge shotgun in the front passenger compartment within FINCH's immediate area of control. Agents recovered this shotgun and determined it was a Stevens Model 320 12 gauge shotgun bearing serial number 134161P. A further search of the vehicle revealed approximately one-half ounce of suspected methamphetamine concealed in the backseat area.

A review of FINCH's criminal history reveals multiple previous felony convictions. These include a conviction on November 14, 2016, from the 19<sup>th</sup> District Court in Waco, Texas, under cause number 15-2489-C, for Burglary of a Habitation, a 2<sup>nd</sup> Degree Felony Offense. This conviction resulted in FINCH being sentenced to four years of incarceration in the Texas Department of Criminal Justice.

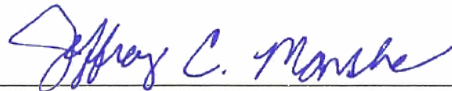
The firearm recovered from FINCH and described above was manufactured outside of the State of Texas, and thus travelled in the stream of interstate commerce prior to its arrival in Texas and meets the definition of a firearm under Federal law, that is, it is capable of expelling a projectile by the action of an explosion.

In addition, all facts as described herein occurred within the Western District of Texas.

A handwritten signature in blue ink, appearing to read "Daniel Tichenor", written over a horizontal line.

DANIEL TICHENOR, Special Agent  
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO before me on the 2nd day of June, 2021.

A handwritten signature in blue ink, appearing to read "Jeffrey C. Manske", written over a horizontal line.

JEFFREY C. MANSKE  
UNITED STATES MAGISTRATE JUDGE